

Exhibit 2

**BLACKJEWEL, LLC, ET AL. v.
UNITED BANK**

JEFFERY HOOPS
10/13/2021

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

In re:

Chapter 11

Blackjewel, L.L.C., et al,

Case No. 19-30289

Debtors ,

(Jointly Administered)

BLACKJEWEL, L.L.C., et al.

Plaintiffs,

V.

Adv. Proceeding 3:20-ap-03007

12 | UNITED BANK,

Defendant.

6

Videotaped deposition of JEFFERY HOOPS taken by the Defendant under the Federal Bankruptcy Rules in the above-entitled action, pursuant to notice, before Elizabeth A. Hill, Court Reporter, at Steptoe & Johnson, 1700 Chase Tower, Charleston, West Virginia, on the 13th day of October, 2021.

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1 Q. So, Mr. Hoops, you have been handed what's
2 been marked as Exhibit XX.

3 A. Yes, sir.

4 Q. After you have a moment to take a look at
5 it, let me know.

6 A. Yes, sir.

7 Q. This is an email from what I -- I shouldn't
8 say that. This says it's an email sent on behalf
9 of jhoops4379@aol.com. Do you see that?

10 A. Yes.

11 Q. Is that your AOL email address?

12 A. Yes, sir.

13 Q. Okay. And it's addressed to "All
14 Blackjewel employees"; is that right?

15 A. Yes, sir.

16 Q. Is it your understanding that this was an
17 email sent to all Blackjewel employees on your
18 behalf?

19 A. Yes, sir.

20 Q. Okay. And it's more than -- it's more than
21 just a timeline. I'm not trying to minimize it in
22 that sense, but many of the bullet points are more
23 timeline issues; right?

24 A. That's correct.

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1 Q. Okay. Did you prepare this email that was
2 sent?

3 A. I prepared the initial draft, and then
4 Squire assisted in editing it and -- and making
5 recommendations -- recommended changes. And so
6 they helped review it and modify it before I sent
7 it out to the employees.

8 Q. That was my understanding, so I may ask you
9 fewer questions about it, but this email was sent
10 on -- or was not my understanding, so I may ask you
11 fewer questions about it.

12 But this email was sent on July 4th, 2019;
13 correct?

14 MR. HAYES: Objection. The question
15 is unintelligible.

16 Q. Did you -- were you able to divine the
17 complicated question of whether this email was sent
18 on July 4th, 2019?

19 MR. HAYES: I was referring to the
20 precursor.

21 MR. KANE: Is that an objection?

22 MR. HAYES: Yes.

23 MR. KANE: Okay.

24 Q. You can answer. Was this email sent on